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**VIA ELECTRONIC FILING AND FAX (1-973-297-4906)**

Honorable Madeline Cox Arleo, United States Magistrate Judge  
United States District Court  
MARTIN LUTHER KING COURTHOUSE  
50 Walnut Street – Room 2060  
Newark, New Jersey 07101

Re: **Russell-Brown v. The University of Florida Board of Trustees et al., No. 10-cv-04017-SDW-MCA**

Dear Judge Arleo:

I represent Plaintiff Sherrie Russell-Brown in the above-referenced matter. Respectfully, I write to bring a time-sensitive issue to Your Honor's attention, regarding Ms. Russell-Brown's pending Motion to Amend/Correct (Dkt Entry No. 44), with a motion date of January 3, 2011, and the Defendants', the University of Oxford ("Oxford") and Oxford University Development (North America), Inc. ("Oxford NA"), Motions to Dismiss (Dkt Entry Nos. 46 and 47), with a motion date of February 7, 2011. Ms. Russell-Brown's opposition brief is currently due this Monday, January 24, 2011.

Today, counsel for Defendants Oxford and Oxford NA requested that Ms. Russell-Brown consent to an extension of their motion date from February 7 to February 22, 2011. While Ms. Russell-Brown is not opposed to a short delay to file her opposition brief and for the Defendants Oxford and Oxford NA to file their reply briefs, she is not inclined to agree to a lengthier delay, because not all of the Defendants and allegations have been joined yet in this action. More specifically, Your Honor's December 7, 2010 Text Order (Dkt Entry No. 43) struck Ms. Russell-Brown's Second and Third Amended Complaints (Dkt Entry Nos. 20 and 39) and directed the Defendants to re-file their motions to dismiss Ms. Russell-Brown's First Amended Complaint (Dkt Entry No. 7) and/or their answers, on or before December 21, 2010. However, as explained in my December 9, 2010 letter to Your Honor (Dkt Entry No. 45), three of the eight Defendants, ALM

Media, LLC, William L. Pollak and Karen Sloan, are not named in the First Amended Complaint, because the factual allegations regarding those parties occurred *subsequent* to the filing of the First Amended Complaint, on August 31, 2010. An additional three of the eight Defendants, the University of Florida, Board of Trustees, the University of Florida, Levin College of Law, and Robert H. Jerry, II, were served with the stricken Third Amended Complaint but not the First Amended Complaint. Consequently, only two of the eight Defendants, Oxford and Oxford NA, re-filed motions to dismiss, as directed by Your Honor. Which is why, in light of Your Honor's December 7, 2010 Text Order, Ms. Russell-Brown immediately sought leave on December 9, 2010 to file and serve her supplemental complaint.

Again, in light of the Defendants', Oxford and Oxford NA, request for an extension of their motion date, pushing this matter until the end of February, I wanted to bring the procedural posture of this case to Your Honor's attention and to formally request a status conference, if Your Honor feels that that might be helpful.

Thank you for your consideration.

Respectfully submitted,

s/ Lennox S. Hinds

LSH/sbt

cc: Zoë Eva Jasper, Esq., Attorney for Defendants the University of Oxford and Oxford University Development (North America), Inc. (via CM/ECF)

Bruce S. Rosen, Esq., Attorney for Defendants ALM Media, LLC, William L. Pollak and Karen Sloan (via CM/ECF)

Ian S. Marx, Esq., Attorney for Defendants the University of Florida, Board of Trustees, the University of Florida, Levin College of Law and Robert H. Jerry, II (via CM/ECF)